

## **Exhibit A**



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April 13, 2012

BY E-MAIL

Samuel H. Rudman, Esq.  
Evan J. Kaufman, Esq.  
Robbins Geller Rudman & Dowd LLP (LI)  
58 South Service Road, Suite 200  
Melville, NY 11747

**Re: *City of Pontiac Gen. Emp's Ret. Sys. v. Lockheed Martin Corp., et al.*,  
No. 11 Civ. 5026 (JSR)(RLE) (S.D.N.Y.)**

Dear Sam and Evan:

We write concerning your letter of today (the "April 13th Letter") and your refusal to respond to the First Interrogatory of Defendants' First Set of Interrogatories to Lead Plaintiff requesting identification of the six "Confidential Witnesses" ("CWs") referenced throughout the Amended Complaint. We are disappointed that you have refused to disclose the names of the CWs and, for the reasons we previously discussed, we do not believe that your refusal to do so is consistent with the recent case law in this District. (See March 23rd Letter from James Wareham at 1-2 (citing *Plumbers and Pipefitters Local Union No. 630 Pension-Annuity Trust Fund v. Arbitron, Inc.*, 2011 WL 5519840 (S.D.N.Y. Nov. 14, 2011) (Engelmayer, J.); *In re Bear Stearns Cos., Inc. Securities, Derivative, & ERISA Litigation*, 2012 WL 259326 (S.D.N.Y. Jan. 27, 2012) (Sweet, J.); *In re American International Group, Inc. 2008 Securities Litigation*, No. Civ. 4772 (LTS) (DF) (S.D.N.Y. Mar. 6, 2012) (Freeman, M.J.)).

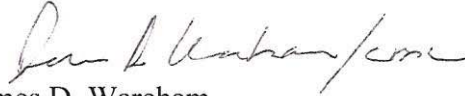
At this point, the parties have engaged in several conversations on this issue. We have also exchanged correspondence detailing our respective views, for our part complete with citations to multiple S.D.N.Y. decisions supporting our position. Since you have determined, inconsistent with what we believe to be the governing law, that you have "fully complied with [your] discovery obligations and [are] not required to identify each CW listed in the Amended Complaint by name," Defendants do not believe an additional meet and confer will be productive and request that you make yourself available for a joint call with the Court on this issue on the morning of April 17th in accordance with Rule 2 of Judge Rakoff's Individual Rules of Practice.

Samuel H. Rudman, Esq.  
Evan J. Kaufman, Esq.  
April 13, 2012  
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Lastly, please also advise when you anticipate producing documents in response to Defendant's First Set of Document Requests to Lead Plaintiff, dated March 7, 2012.

Sincerely,

**DLA Piper LLP (US)**

A handwritten signature in cursive script, appearing to read "James D. Wareham".

James D. Wareham

cc: John M. Hillebrecht, Esq.